

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Establishing the Length of License Terms  
for Hydroelectric Projects** )  
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**Docket No. RM 17-4-000**

**COMMENTS OF THE NATIONAL HYDROPOWER ASSOCIATION, COLORADO  
RIVER ENERGY DISTRIBUTORS ASSOCIATION, EDISON ELECTRIC INSTITUTE,  
NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION, AND  
NORTHWEST HYDROELECTRIC ASSOCIATION REGARDING THE  
COMMISSIONS NOTICE OF INQUIRY ON ESTABLISHING THE LENGTH OF  
LICENSE TERMS FOR HYDROELECTRIC PROJECTS**

The National Hydropower Association (NHA), Colorado River Energy Distributors Association (CREDA), Edison Electric Institute (EEI), National Rural Electric Cooperative Association (NRECA), and Northwest Hydroelectric Association (NWhA) (collectively, “Industry Commenters”) appreciate the opportunity to submit these comments and recommendations in response to the Federal Energy Regulatory Commission’s (FERC or Commission) November 17, 2016, Notice of Inquiry (NOI) *Establishing the Length of License Terms for Hydroelectric Projects*.<sup>1</sup>

The Commission’s license term policy permeates every aspect of the relicensing process and influences, among other things, the scope of licensing commitments, settlement negotiations, and project economics. The license term policy also informs the decisions licensees make regarding the scope and timing of potential investments during a license term.

The NOI represents a significant opportunity to establish a more efficient and transparent license term policy that better reflects the regulatory and legal framework governing relicensing

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<sup>1</sup> 157 FERC ¶ 61,124 (2016). On January 12, 2017, the Commission extended the comment deadline by 60 days, establishing a new comment deadline of Friday, March 24, 2017.

and project operations. By modernizing its license term policy through the adoption of a 50-year default license term, the Commission can reduce the time, resources, and costs associated with the relicensing process while still maintaining required levels of protection for affected resources throughout a license term. Industry Commenters urge the Commission to reform its policy consistent with the comments below.

## **I. Executive Summary**

Hydroelectric facilities provide clean, reliable, and affordable renewable power to U.S. consumers and support numerous public benefits including recreation, irrigation, flood control, and navigation. Licensees also commit significant resources to protect and enhance fish and wildlife resources that may be affected by project operations. These public benefits and environmental attributes, however, are increasingly at risk.

Downward pressure on electricity prices caused by abundant natural gas, flat demand, and increased market penetration by intermittent resources like wind and solar all contribute to a rapidly changing market and a difficult operating environment for licensees. Adding to these market and economic challenges is a relicensing process that has become increasingly costly, lengthy, and resource-intensive. The relicensing process – which includes development of a relicensing strategy, preparation of a Pre-Application Document, consultation with federal and state agencies and the public, design and implementation of studies, the development of a license application, endangered species act consultation, settlement negotiations, pursuit of a water quality certificate, environmental reviews, and license issuance, can take a decade or more -- and, for some projects, tens of millions of dollars -- to complete. The Commission's existing license term policy creates additional uncertainty for licensees during the relicensing process and, during a license term, can unduly influence and delay the timing and scope of project

improvements and environmental enhancements. These unintended impacts are counter to good public policy and environmental stewardship.

The Commission can alleviate some of these challenges by adopting a default 50-year license term. This new policy will benefit all stakeholders because it provides license term certainty and will reduce the time, resources, and costs associated with the relicensing process, a burden that is shouldered alike by licensees, non-governmental organizations, state and federal resource agencies, community stakeholders, and FERC Staff. Importantly, a 50-year default license term policy would be no less protective of resources than the Commission's current license term policy. The Commission's ability to reopen licenses after notice and opportunity for hearing, the incorporation of adaptive management measures in licenses, and legal obligations under the Endangered Species Act, all potentially serve as mechanisms to address, on a targeted basis, unanticipated resource issues that may arise during a 50-year license term. This enables the Commission to address new resource issues as they may arise, without necessitating a full-scale relicensing review of project operations at intervals of less than 50 years. This approach is entirely consistent with the Commission's responsibilities under the Federal Power Act.

If the Commission does not adopt a 50-year default license term, the Commission should modify its existing license term policy. Specifically, when determining the term of a new license the Commission should recognize and credit additional investments and improvements (both developmental and non-developmental) implemented during an existing license term and when a licensee is operating under an annual license, if those investments and improvements were not otherwise required by the existing license when issued. The Commission also should modify its existing license term policy to ensure that license terms negotiated by the licensee and stakeholders through settlement agreements are given deference. Lastly, if the Commission

incorporates a quantitative cost-based analysis into its license term policy, the policy should ensure that *all* costs incurred by the licensee are considered.

Regardless of whether the Commission adopts a 50-year default license term policy or modifies its existing policy, the Commission should provide licensees an opportunity to extend existing license terms to 50 years without requiring any capacity additions or substantial capital investment. Such extensions should be available upon a demonstration that either a project is not likely to require a full-scale relicensing review prior to the end of a 50-year term or, alternatively, that specific and targeted resource issues could be addressed, as necessary, as part of the license extension. Under Industry Commenters proposal, such extensions would be filed by licensees with the Commission 3 years before the Notice of Intent is due, with a decision by FERC no later than 18 months before the Notice of Intent must be filed.

## **II. Overview of Industry Commenters**

NHA is a national non-profit association dedicated exclusively to advancing the interests of the U.S. hydropower industry, including conventional, pumped storage, and new marine and hydrokinetic technologies. NHA's membership consists of over 225 organizations, including consumer-owned utilities, investor-owned utilities, independent power producers, project developers, equipment manufacturers, environmental and engineering consultants, and attorneys.

CREDA is a non-profit organization of wholesale customers of the federal Colorado River Storage Project (CRSP), which produces 1,813 MW of hydroelectric power. CREDA members are all non-profit entities that serve over 4.1 million consumers in Arizona, Colorado, Nevada, New Mexico, Utah and Wyoming. CREDA's mission is to preserve and enhance the availability, affordability, and value of CRSP facilities while promoting responsible stewardship of the Colorado River System.

EEI is the association of U.S. shareholder-owned electric companies. Our members serve approximately 70 percent of the U.S. electric power industry, provide electricity for 220 million Americans, operate in all 50 states and the District of Columbia, and directly employ more than 500,000 workers. With more than \$100 billion in annual capital expenditures, the electric power industry is responsible for one million jobs related to the delivery of power, including the construction of modified or new infrastructure. EEI members are subject to the Commission's jurisdiction, and many own significant amounts of hydropower resources that are subject to FERC licensing. EEI and our members are concerned that the licensing process remains overly lengthy, complex, and costly, and we encourage the Commission to recognize those factors by modifying its policy on license durations to provide for longer licenses while also seeking to streamline and to reduce the time and cost involved in relicensing.

NRECA is the national service organization for America's electric cooperatives, representing more than 900 not-for-profit electric cooperatives providing retail electric service to more than 42 million customers in 47 states. NRECA's members include consumer-owned local distribution systems and 65 generation and transmission cooperatives that supply wholesale power to their distribution cooperative owner-members.

NWHA is a non-profit trade association that represents and advocates on behalf of the Northwest hydroelectric industry. NWHA has 126 member companies from all segments of the industry. The members of NWHA provide 21,450 MWs of hydroelectric power. NWHA is dedicated to the promotion of the Northwest region's waterpower as a clean, efficient energy source while protecting the fisheries and environmental quality that characterize the region.

### III. Overview of Existing FERC Policy and NOI

The Commission is seeking comments on “whether, and, if so, how the Commission should revise its policy for establishing license terms for projects located at non-federal dams.”

The Commission’s current license term policy states:

*It is Commission policy to set a 50-year term for licenses issued for projects located at federal dams. For projects located at non-federal dams, the Commission’s current policy is to set a 30-year term where there is little or no authorized redevelopment, new construction, or environmental mitigation and enhancement; a 40-year term for a license involving a moderate amount of these activities; and a 50-year term where there is an extensive amount of such activity.*

Determining whether measures are minimal, moderate, or extensive is license-specific and based on a qualitative analysis of the record before the Commission. Two other important aspects of the Commission’s license term policy include: (1) a forward-looking approach, such that measures adopted under a previous license term are not considered in establishing a new license term; and (2) to the extent feasible, the coordination of license terms of other projects in the same river basin to maximize future consideration of cumulative impacts at the same time the projects are due to be relicensed.

The Commission’s policy has sought to balance economic concerns and realities related to owning and operating hydroelectric facilities; promote development of new, and retention of existing, renewable power generating sources; and ensure public interest and environmental concerns are addressed. Recently however, licensees have challenged new license terms and the Commission’s position not to consider or give more weight to a broad range of issues,<sup>2</sup> which have highlighted the need for the Commission to review its existing license term policy.

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<sup>2</sup> The range of issues include, but are not limited to, capacity-related investments or environmental enhancements made during the current license term, the total cost of the relicensing process, losses in generation as a result of relicensing, and the license term negotiated in a settlement agreement.

As such, the Commission has outlined five potential options for establishing license terms:

1. Retain its existing license term policy;
2. Add to the existing license term policy the consideration of measures implemented under the prior license;
3. Replace the existing license term policy with a 50-year default license term unless the Commission determines that a lesser license term would be in the public interest (for example to better coordinate, the extent feasible, the license terms for projects in the same river basin for future consideration of cumulative impacts);
4. Add a more quantitative cost-based analysis to the existing license term policy;  
and
5. Alter current policy to accept the longer license term agreed upon in an applicable settlement agreement, when appropriate.

#### **IV. The Commission Should Adopt a 50-Year Default License Term Policy**

Relicensing a hydropower facility requires substantial time, money, and resources for all parties involved, including the licensee, the Commission, state and federal resource agencies, non-governmental organizations, and local stakeholders. As compared to other renewable energy projects or natural gas projects, which can be permitted and constructed within two to three years, the relicensing process can take up to a decade or more to complete. Compounding this disparity among generation resources is a hydroelectric relicensing construct in which licensees lack -- until the very end of the relicensing process -- certainty about the new license term, the extent of investment required, and the ability to fully recover costs associated with the new license.

Establishing a default license term of 50 years is justified for a number of public policy and practical reasons. First, and foremost, a 50-year license term policy would result in administrative efficiency by minimizing the demands of relicensing on the Commission, resource agencies, stakeholders, and licensees. It would also be consistent with the Commission's current policy to set a 50-year term for licenses issued for projects located at federal dams and original licenses requiring the construction of a new dam.<sup>3</sup> The relicensing of a hydroelectric project is a massive undertaking, requiring the dedication of substantial resources for stakeholder outreach, development of licensing documents, implementation of study plans, agency consultations, negotiations, and pursuit of related authorizations including a water quality certificate pursuant to section 401 of the Clean Water Act. All of these requirements demand significant investments in time and money by all of the parties involved in a relicensing. Furthermore, hydropower facilities are long-lived assets that merit and fit well with a 50-year license term. Many existing projects have been in operation for more than 50 years and through upgrades and careful management can continue to operate well into the future.

Second, the Commission reserves its authority to reopen a license, after notice and opportunity for hearing, should circumstances warrant. Similarly, resource agencies with mandatory conditioning authority reserve their authority to address future resource issues as may be necessary. Additionally, resource agencies can petition FERC to reopen a license, and licensees are under an obligation to comply with the requirements of the Endangered Species Act. Lastly, many licenses have adaptive management provisions that can effectively address

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<sup>3</sup> The NOI states that “the length of an original license has not been contested on rehearing for some time”, and while Industry Commenters comments are in the context of relicensing and new licenses, we also recommend the Commission, for many of same reasons articulated throughout these comments, adopt a 50-year default license term for all original licenses.



changing circumstances throughout a 50-year license term. Consequently, it is unnecessary to undertake a full-scale relicensing review of project operations at intervals of less than 50 years.

Third, the frequency and duration of the relicensing process places hydroelectric resources at a competitive disadvantage in the marketplace. Despite all of its favorable environmental benefits, its contributions to the reliability and stability of the grid, and its role in integrating intermittent resources, hydroelectric facilities are subject to a recurring and lengthy permitting process not required of the majority of resources in the market. The relicensing process not only adds substantial costs to a project, it creates substantial uncertainty for hydroelectric resources regarding potential constraints on future operations. This uncertainty is compounded by the length of the relicensing process which can often take a decade or more to complete. Other resources in the marketplace do not operate under these regulatory constraints and, as a result, are often better situated to respond to changing market conditions. Hydroelectric assets -- extremely valuable and long-lived resources in our domestic generation portfolio -- should be able to compete on a more level playing field. The Commission can help ensure that result by requiring the relicensing process to occur no earlier than every 50 years.

If the Commission adopts a 50 year default license term, the Commission should not depart from this policy except in extraordinary circumstances or at the request of a licensee.<sup>4</sup> Specifically, a desire to coordinate the license terms of projects in a given basin should not justify a downward departure from a default 50-year license term. Said differently, coordination of projects can occur as necessary in the future, but need not be dictated at the time of relicensing through a uniform license termination date for all projects in a basin. Otherwise, the coordination policy would become the exception that usurps the 50-year default rule.

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<sup>4</sup> For example, licensees may request a license term of less than 50 years to reflect a license term negotiated with stakeholders as part of a settlement agreement.

Finally, in response to the Commission's inquiry, Industry Commenters do not believe the adoption of a 50-year default license term policy will adversely affect the ability of parties to successfully negotiate and execute settlement agreements during the relicensing process. Rather, the assumption of a 50-year license term is likely to facilitate settlements because the policy provides certainty regarding the length of the license term and licensees will be more likely to enter into settlements knowing in advance the term of the new license.

For all of these reasons, Industry Commenters urge the Commission to adopt a 50-year default license term.

**V. If the Commission Does Not Adopt a 50-Year Default License Term, the Commission Should Modify its Existing License Term Policy**

A. The Commission Should Not Retain its Existing License Term Policy

The Commission's current license term policy, adopted over two decades ago, no longer reflects current market or operating realities. The policy also can undermine the public interest because it may incentivize licensees to postpone project improvements, environmental enhancements, and other capital investments in order to secure a longer term under the new license. This results because, under the current policy, the Commission does not consider improvements made during the current license term and requires "moderate" and "extensive" improvements as a condition of receiving a new license with a term greater than 30 years.

The Commission's existing license term policy also can have unintended consequences related to the negotiation and execution of a settlement. Licensees may be unwilling to commit, in the context of a settlement, to significant voluntary enhancements when there is uncertainty regarding whether the commitments will justify a 50-year license term. This uncertainty is created, in part, because there is not a "bright line" rule (*i.e.*, new licenses will receive a 50-year term); rather, there is a subjective determination as to whether the improvements agreed to by the

licensee will be considered moderate or extensive. Without assurance that a 50-year license will be forthcoming, licensees may moderate their voluntary license commitments.

Similarly, the Commission's policy regarding the coordination of license terms for projects located in the same basin also injects uncertainty into the relicensing process. If licensees believe that "extensive" improvements could nonetheless result in something less than a 50-year license because of a conflicting policy that favors basin-wide coordination, licensees may prudently limit their voluntary licensing commitments. This, in turn, may impede settlement negotiations and, by extension, unnecessarily limit the scope of protection, mitigation, and enhancement measures ("PM&E measures") volunteered by the licensee to the potential detriment of the surrounding environment and the public interest.

Given the time and resources needed to complete relicensing and the uncertainty created by the existing license term policy, Industry Commenters alternatively recommend that the Commission modify its existing license term policy.

B. The Commission Should Consider Project Improvements, Environmental Enhancements, and Other Such Measures Implemented During the Previous License Term and Ensuing Annual License

If the Commission does not adopt a 50-year default license term for relicensed projects, the Commission should revise its policy to provide that measures implemented during an existing license and during annual licenses, will be considered when assessing whether a new license term should be 40 or 50 years. Modifying the Commission's current policy in this manner is good public policy and will encourage licensees to consider early action to address, among other things, resource issues and recreational improvements. It also will remove the current disincentive to invest in new or additional PM&E measures until relicensing concludes in order to maximize the new license term.

“Early measures” that should inform the Commission’s determination regarding the new license term should include all project investments (*e.g.*, developmental and non-developmental) implemented but not required under the existing license and under ensuing annual licenses prior to the issuance of a new license. Importantly, the Commission should expressly consider the replacement of major equipment at the end of its useful life as these investments are among the most expensive improvements that a licensee will undertake.

C. If The Commission Undertakes Quantitative Cost-Based Analyses to Establish License Terms, the Commission’s Analyses Should Consider All Licensee Costs

If the Commission modifies its existing license term policy, and includes a quantitative, cost-basis component as part of its license term determination, the Commission should consider: (1) *all* costs that the licensee expends on developmental and non-developmental improvements during the existing license term and ensuing annual licenses (other than those improvements required by the existing license when issued); (2) all costs associated with the relicensing process (*e.g.*, costs of studies, regulatory and legal costs, the value of lost generation, and any measures implemented prior to the issuance of the new license); and (3) all new measures proposed as part of the new license application, including all settlement commitments made during relicensing (including “off-license” commitments that may be outside of FERC’s jurisdiction but are nonetheless in the public interest).

In addition, the Commission should account for such factors as the public benefits provided by the project (including the generation of zero emission power and contributions to the reliable operation of the grid), and the relative need for improvements at a particular facility. A project should not receive a shorter license term simply because the project or the surrounding environment did not require a significant expenditure of funds. In fact, it is counterintuitive that

a project that is best adapted to the waterway and operating efficiently should receive a 30-year license simply because there is not a demonstrated need to make significant expenditures on additional PM&E measures. These are the very types of projects that do not need a full-scale relicensing review every thirty years.

If a quantitative analysis is employed by the Commission, and the Commission seeks cost data associated with project enhancements and resource improvements, the licensee remains in the best position to provide these data to the Commission in a relicensing proceeding. Absent a showing by another stakeholder that the licensee's data are unreliable, the Commission should continue to give significant deference to cost information provided by the licensee.

D. The Commission Should Defer to License Terms Established by Settlement Agreements

If the Commission does not adopt a 50-year default license term, the Commission should defer to the license term agreed upon by the licensee and other settling parties. Such a policy is in the public interest because it would facilitate and encourage the negotiated resolution of licensing issues through settlement agreements.

The license term is a critical element that informs a licensee's overall investment strategy, and to the extent it is understood that a settlement agreement can determine the license term, the licensee is provided with "regulatory certainty" in advance of license issuance. This certainty will inform settlement discussions, particularly with regard to the scope of mitigation, and may create incentives to settle knowing that settlements may produce longer license terms than may otherwise be available under the Commission's existing policy. In contrast, where the parties have no certainty that their agreed-upon license term will be adopted by the Commission, licensees may be less willing to offer substantial voluntary commitments. Not only does this make it more difficult to settle in the first instance, but it also may prevent parties from achieving

the most mutually beneficial outcome, counter to good public policy and environmental stewardship.

Because agreement on the length of the new license term is generally a fundamental element of any settlement agreement, the Commission should defer to the intent of the parties absent a compelling demonstration that the public interest demands otherwise. Parties seeking to override the settling parties' agreed-upon term should bear a heavy burden to make such a demonstration and Commission policy should disfavor upsetting the intent of the licensee and the other parties to the settlement agreement.

#### **VI. The Commission Should Adopt a Policy That Enables Licensees to Extend Existing License Terms to 50 Years Without Requiring Capacity Additions**

While not addressed specifically in the NOI, the Commission should adopt a policy that enables a licensee with a term of less than 50 years to extend its license term up to 50 years without requiring capacity additions or substantial capital investment. This policy should be implemented regardless of whether the Commission adopts a new 50-year default license term policy or modifies its existing policy.

To the extent specific resource issues may need to be addressed at the time the license term extension is requested, targeted mitigation and enhancement measures can be imposed as part of the extension. This obviates the need for a full-scale relicensing review prior to the end of a 50-year term, but allows the Commission to impose discrete measures – as may be necessary – during the period between when the license would have expired and the end of the 50-year term. Under Industry Commenters proposal, such extensions would be filed by licensees with

the Commission three years before the Notice of Intent is due, with a decision by FERC no later than eighteen months before the Notice of Intent must be filed.<sup>5</sup>

The benefits of this policy are three-fold. First, many projects are operating under licenses issued after enactment of the Electric Consumer Protection Act of 1986 (ECPA) and these projects generally operate with substantial environmental protection and enhancement measures already in place. These projects may not need to undergo a comprehensive relicensing review, or may need to implement only discrete additional measures, prior to the expiration of a 50-year license term. Similarly, projects awarded 30 or 40 year license terms during a previous relicensing because they were environmentally benign, and did not require substantial new investments in mitigation measures, may not need to undertake a full relicensing at the end of their current license term. Thus, this policy would recognize that – in many cases – the cost, time, and resources that relicensing requires may be delayed and replaced with a license extension that could include, as necessary, such measures as may be required to address specific issues at the project.

Second, adoption of this policy would directly address the administrative burdens that relicensing places on licensees, the Commission, and all stakeholders involved in relicensing processes. By acknowledging that not all projects need to undergo a top-to-bottom relicensing review at intervals less than 50 years, Commission policy can focus licensee, stakeholder, and staff resources on projects where the Commission has determined that a license extension is not

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<sup>5</sup> Industry Commenters recommend that the Commission grant a licensee request to extend an existing license term to 50-years unless resource agencies and other interested stakeholders can demonstrate, after notice and opportunity for comment, that: (1) delaying relicensing would not be in the public interest because of the scope and magnitude of project issues; and (2) resource issues could not be addressed by targeted, discrete, measures implemented by the licensee during the license extension. Licensees would have an opportunity to respond to stakeholders. Prior to a final Commission determination the licensee should be provided some indication by the Commission of what measures may be required as part of the extension. This would allow the licensee to make an informed decision about whether to continue to pursue the license extension or withdraw the license extension request and begin the relicensing process.

appropriate or where a 50-year license is expiring. Given the demands of relicensing, this is a much more efficient allocation of resources.

Third, this policy would recognize that under the current relicensing paradigm, hydroelectric resources -- with all of their attendant reliability and environmental attributes -- are disadvantaged relative to other resources in the market. Most generators operating in the market today simply do not have to address the costs, operational uncertainties, and dedicated personnel that the relicensing process requires. By allowing projects to extend their existing licenses to 50 years, the Commission can help level the playing field so that licensees -- like other generation resources -- can focus on power generation, planning, and operations to meet the needs of consumers and help ensure grid reliability.

## **VII. Conclusion**

Industry Commenters appreciate the opportunity to provide these comments and supports the Commission's initiative to reexamine its license term policy and to consider revisions that better reflect the legal, regulatory and operational constraints that hydroelectric licensees face in today's marketplace. The NOI represents an excellent example of a Commission initiative that will proactively improve the relicensing process.

A 50-year default license term would reduce the administrative and cost burdens that are imposed on all participants involved in relicensing processes, help level the playing field for hydroelectric resources, and would be no less protective of resources than the Commission's current license term policy. The Commission's policy also should be flexible enough to allow licensees to extend existing license terms to 50 years without requiring capacity additions or substantial capital investment. This policy change is necessary because many hydroelectric



facilities, including those currently operating under post-ECPA licenses, may not need to undertake relicensing at the end of an existing license term.

Accordingly, Industry Commenters respectfully request that the Commission revise its license term policy consistent with the comments set forth above.

Respectfully submitted,

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